

NEWMAN | WILLIAMS
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ATTORNEY FOR: Defendants, Carbon County
and Joseph Hager

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRETT RODRIGUEZ,
Plaintiff,

v.

CARBON COUNTY, ET. AL.
Defendants

No. 3:20-cv-00258

Jury Trial Demanded

**Motion to Lift Stay by Defendants,
Carbon County and Joseph Hager**

The Defendants, Carbon County and Joseph Hager, through their counsel, move to lift the stay issued by the court on April 28, 2020 (ECF No. 30) for the following reasons:

1. On April 28, 2020, the court granted a stay in this case pending the resolution of a Carbon County State criminal action filed against the Plaintiff. (Doc. No. 30).

2. The stay was issued because, if Plaintiff had been convicted in his Carbon County criminal case, it was likely he would not move forward with this lawsuit.

3. The Plaintiff was acquitted in his criminal case and Carbon County's defense lawyer advised the court of this fact in a letter filed on September 27, 2021 (Doc. No. 47).

4. All parties agree that the stay may be lifted, and the case proceed forward.

WHEREFORE, the defendants, Carbon County and Joseph Hager, move to lift the stay and ask the court to impose deadlines for the defendants' responses to plaintiff's amended complaint (Doc. No. 29).

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By: 
Gerard J. Geiger, Esquire
Attorney I.D. # PA 44099

Date: October 4, 2021

Certificate of Service

I hereby certify that, on this date, a copy of this document was served upon all counsel of record via ECF.

NEWMAN | WILLIAMS

By: 

Gerard J. Geiger, Esquire
Attorney I.D. # PA 44099

Date: October 4, 2021